



February 10, 2009
VIA ECFS

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Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
2008 CPNI Certification Filing for Andiamo Telecom, LLC

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Andiamo Telecom, LLC hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas
Consultant to Andiamo Telecom, LLC

ST/im.
Enclosure

cc: Best Copy and Printing FCC@BCPIWEB.COM
FCC Enforcement Bureau (provided via ECFS website)
R. Torraca, Andiamo
File: Andiamo - FCC CPNI
TMS: FCCX0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: **Andiamo Telecom, LLC**

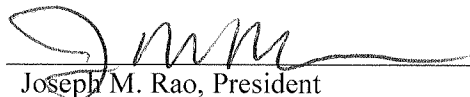
Form 499 Filer ID: 824762

Name of signatory: Joseph M. Rao

Title of signatory: President

I, Joseph M. Rao, certify and state that:

1. I am the President of **Andiamo Telecom, LLC** and, acting as an agent of the company, I have personal knowledge of **Andiamo Telecom, LLC's** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Andiamo Telecom, LLC's** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



Joseph M. Rao, President

11/30/2009

Date

Exhibit A
Statement of CPNI Procedures and Compliance

Andiamo Telecom, LLC

Statement of CPNI Procedures and Compliance

The Andiamo Telecom, LLC ("Andiamo" or "the Company") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and has trained its personnel that they are not to use CPNI for marketing purposes. Should Andiamo elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

As set forth below, Andiamo has processes and procedures in place to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The Company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed.

The Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. If the call detail cannot be provided, the Company will either call the customer back at the telephone number of record to provide the requested information or send the information to the customer's address of record. If Andiamo elects in the future to provide telephone access to CPNI in response to a customer-initiated inquiry, it will establish authentication and password procedures that comply with the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information.

For online account access, Andiamo has established authentication and password procedures that are in compliance with the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information. The Company qualifies as a small business entity under the Regulatory Flexibility Act or Small Business Act because it is a CLEC and IXC reseller with fewer than 1500 employees. It was therefore accorded additional time under the FCC rules to put these online account processes in place. The Company instituted its new procedures prior to June 8, 2008.

Company has instituted procedures to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account or address of record is created or changed without revealing the changed information or sending the notification to the new account information. The Company notifies the customer via mail to the customer's address of record.

Andiamo does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company has not had any breaches of its customers' CPNI during the past year, but does have processes in place to ensure that it maintains electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI, as well as to customers.

Andiamo has not taken any actions against data brokers in the last year and did not receive any customer complaints about the unauthorized release or disclosure of CPNI in calendar year 2008.

Andiamo has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this Statement.